

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of	§	
	§	
Nationwide Number Portability	§	WC Docket No. 17-244
	§	
Numbering Policies for Modern	§	WC Docket No. 13-97
Communications	§	
	§	

INITIAL COMMENTS OF THE TEXAS 9-1-1 ENTITIES

The Texas 9-1-1 Alliance,¹ the Texas Commission on State Emergency Communications,² and the Municipal Emergency Communication Districts Association³ (collectively, the “Texas 9-1-1 Entities”) respectfully submit the following brief initial comments on the Federal Communication Commission (the “Commission”) Notice of Proposed Rulemaking (“NPRM”) and Notice of Inquiry (“NOI”) in the above-referenced proceedings.⁴ In the NPRM and NOI, the Commission seeks comments on how best to move toward complete nationwide number portability (“NNP”), specifically with regard to the proposed amending of Commission rules to remove the N-1 query requirement, the proposed forbearance from remaining interexchange

¹ The Texas 9-1-1 Alliance is an interlocal cooperation entity composed of 26 Texas emergency communication districts with E9-1-1 service and related public safety responsibility for more than approximately 63% of the population of Texas. These emergency communication districts were created pursuant to Texas Health and Safety Code Chapter 772 and are defined under Texas Health and Safety Code Section 771.001(3)(B).

² The Texas Commission on State Emergency Communications (“CSEC”) is a state agency created pursuant to Texas Health and Safety Code Chapter 771, and by statute is the state program authority on emergency communications. CSEC’s membership includes representatives of the Texas 9-1-1 Entities and the general public, and directly oversees and administers the Texas state 9-1-1 program under which 9-1-1 service is provided in 206 of Texas’ 254 counties, covering approximately two-thirds of the state’s geography and one-fourth of the state’s population.

³ The Municipal Emergency Communication Districts Association (“MECDA”) is an association of 26 municipal emergency communication districts, as defined under Texas Health and Safety Code Section 771.001(3)(A), that are located primarily in the Dallas-Fort Worth area.

⁴ See *Nationwide Number Portability, Numbering Policies for Modern Communications*, WC Docket Nos. 17-244 and 13-97, Notice of Proposed Rulemaking and Notice of Inquiry (rel. Oct. 26, 2017) (available at https://apps.fcc.gov/edocs_public/attachmatch/FCC-17-133A1.pdf).

dialing parity requirements of section 251(b)(3), and how additional changes facilitating NNP might potentially impact 9-1-1 and/or NG9-1-1 and the proposed resolution of such issues.⁵

- I. Prior to the Commission proposing any new rules to promote NNP, NENA and ESIF should conduct an analysis of the full impacts of Non-Geographic Number Portability (NGNP) on emergency call routing systems, and thereafter make reasonable recommendations to the Commission as to how to address potential 9-1-1 routing issues associated with NNP.**

It has been well documented in prior Commission proceedings that any number portability that disassociates legacy wireline telephone numbers from the rate centers tied to those telephone numbers for 9-1-1 call routing purposes may potentially adversely impact proper routing of 9-1-1 calls.⁶ Consequently, with regard to specific 9-1-1 and NG9-1-1 solutions for NNP routing issues, the Local Number Portability Administration Working Group (“LNPA WG”) recommended that “National Emergency Number Association (NENA) and Emergency Services Interconnection Forum (ESIF) should conduct the analysis and evaluation of the full impacts of NGNP on the emergency routing systems.”⁷

⁵ *Id.*, at ¶¶ 24, 29, 55, 63, and 64 (“The ATIS Report details several number portability issues affecting emergency calls, and we seek comment on their resolution”).

⁶ *See, e.g., In the Matter of Numbering Resource Optimization*, Report and Order and Further Notice of Proposed Rulemaking, CC Docket No. 99-200 (rel. Mar. 31, 2000 at ¶185 (“In response to comments received from the NENA community regarding the potential problems with implementing thousands-block number pooling in a geographic area beyond the traditional rate center, we conclude that each thousands block pool should be confined to a rate center, which denotes the smallest geographic area used to distinguish rate center boundaries” [footnote in original omitted]), (available at https://transition.fcc.gov/Bureaus/Common_Carrier/Orders/2000/fcc00104.pdf). *See also*, 47 CFR §52.26(a), which states in relevant part that “[l]ocal number portability administration shall comply with the recommendations of the North American Numbering Council (NANC) as set forth in the report to the Commission prepared by the NANC's Local Number Portability Administration Working Group, dated April 25, 1997 (Working Group Report) and its appendices, which are incorporated by reference” and Section 7.3 of the Working Group Report entitled “LNP Portability Boundary,” which provides “[i]f location portability is ordered by a state commission in the context of Phase I implementation of LRN, location portability is technically limited to rate center/rate district boundaries of the incumbent LEC due to rating/routing concerns. Additional boundary limitations, such as the wire center boundaries of the incumbent LEC may be required due to E911 or NPA serving restrictions and/or regulatory decisions.”

⁷ *See* North American Numbering Council, Local Number Portability Administration Working Group, *White Paper on Non-Geographic Number Portability* (Aug. 30, 2016) (“NGNP White Paper”), available via http://www.nanc-chair.org/docs/mitg_docs/Sep16_LNPA_WG_Report.docx (the NGNP White Paper can be found embedded within its September 16, 2016 LNPA Working Group Report, under the heading “Nationwide Number Portability”) at p. 4.

As an initial matter, putting aside any future NENA and ESIF analysis along with potential cost considerations of modifying legacy wireline service provider systems, deployment plans for NNP that include pANI solutions *and/or* Next Generation 9-1-1 (“NG9-1-1”) system deployments that have service providers connecting via SIP and sending location “by value” with their 9-1-1 calls should provide technically feasible ways to mitigate potentially adverse 9-1-1 call routing impacts on legacy wireline services.⁸

With regard to potential cost considerations, the LNPA WG in its NGNP white paper also noted that because of ongoing service provider transitions toward IP-based systems, the costs and benefits of retrofitting and migrating legacy service provider TDM systems should be weighed against focusing more on forward-looking IP-based solutions.⁹ Similarly, to the extent that the Commission can encourage forward-looking long-term NG9-1-1 solutions that have service providers connecting via SIP and sending location “by value” with their 9-1-1 calls, that approach might facilitate IP transition better or more cost effectively, rather than solely focusing on transitional pANI solutions to address any 9-1-1 routing issues associated with NNP.

The Texas 9-1-1 Entities support the recommendations included in the NGNP White Paper. Prior to the Commission moving forward with new rules to promote NNP, NENA and ESIF should conduct the analysis described above, and thereafter make reasonable

⁸ There are already a few identified service type cases in the NENA i3 standard where data by value has been noted as being preferred, c.f., NENA i3 standard at page 170 (“If the broadband network is a fixed network like a cable modem network or DSL, location by value is preferred, but location by reference is acceptable”), available at http://c.yimcdn.com/sites/www.nena.org/resource/resmgr/standards/NENA-STA-010.2_i3_Architectu.pdf. Location “by reference” may also be an alternative option to location “by value” if the location “by reference” information can be obtained quickly and consistently enough for 9-1-1 routing purposes.

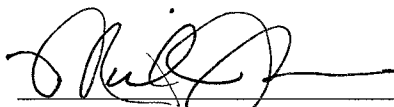
⁹ NGNP White Paper at p. 12 (“Efforts to implement NGNP in a TDM environment (or an environment transitioning from TDM to IP) would require significant re-engineering of legacy TDM infrastructure, would require an extended duration of time to design and implement, and will necessitate a thorough review for impacts on the underlying number assignment and number portability rules, regulations, systems and processes. Some Service Providers may already be making plans or undergoing system and switch upgrades to support and implement IP with upgraded equipment and given the industry is moving away from TDM-based networks, the re-engineering of the TDM environment to support NGNP would be costly and the benefits short-lived.”)

recommendations to the Commission on addressing potential 9-1-1 routing issues associated with NNP. In that analysis, NENA and ESIF should consider whether utilizing forward-looking long-term NG9-1-1 solutions that have service providers connecting via SIP to NG9-1-1 systems and sending location “by value” with their 9-1-1 calls might facilitate IP transition in a better or more cost-effective manner.

II. Conclusion

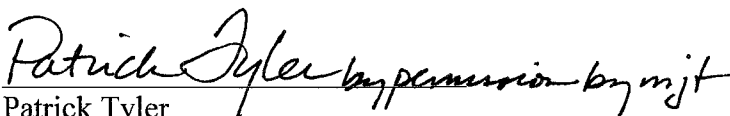
The Texas 9-1-1 Entities appreciate the opportunity to provide the foregoing brief initial comments on these matters, and respectfully request that the Commission take action in a manner consistent with these comments.

Respectfully submitted,



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